REMARKS

Claims 1-8 are Allowable

The Office has rejected claims 1-8 on page 2 of the Office Action, under 35 U.S.C. § 102(e) as being anticipated by United States Patent Publication No. 2005/0153740 (Binzel et al.). Applicant respectfully traverses the rejections.

The cited portion of Binzel et al. fails to disclose or suggest the specific combination of claim 1. For example, the cited portion of Binzel et al. does not disclose at least one smart card having a first MSISDN/IMSI combination that includes IMSI and MSISDN information, a private content IMSI/MSISDN that includes IMSI and MSISDN information, and a security function that associates the private content IMSI/MSISDN stored in the memory with the first MSISDN/IMSI combination, as recited in claim 1. Support for this claim amendment may be found in at least paragraphs [0018] and [0020] of Applicant's application.

Binzel et al. is directed towards an electronics device that includes a SIM card. *Binzel et al.*, paragraph [0013]. Insertion of the SIM card or powering up of the electronic device causes key information to be generated to determine whether any prior associations have been made between information on the SIM card and supplemental information stored on the electronic device. *Binzel et al.*, paragraph [0016]. The key information is generated from a subscriber identification portion of an International Mobile Subscriber Identity (IMSI). *Binzel et al.*, paragraph [0017]. A key is generated for each record on the SIM card. *Binzel et al.*, paragraph [0017]. A corresponding key is stored on the electronic device for each record of supplemental information also stored thereon. *Binzel et al.*, paragraph [0018] and Fig. 3. If the key of the record on the SIM card matches the key associated with the record of the supplemental information, access is granted to the supplemental information by generation of a link between the two records. *Binzel et al.*, paragraph [0021] and Fig. 3.

In contrast to claim 1, the cited portion of Binzel et al. does not disclose at least one smart card having a first MSISDN/IMSI combination that includes IMSI and MSISDN information, a private content IMSI/MSISDN that includes IMSI and MSISDN information, and a security function that associates the private content IMSI/MSISDN stored in the memory with the first

MSISDN/IMSI combination. In Binzel et al., a key for each record on the SIM card is compared to a key on each record of the supplemental information on the electronic device. *Binzel et al.*, paragraph [0021] and Fig. 3. The keys in Binzel et al. do not disclose an MSISDN/IMSI that includes IMSI and MSISDN information. In contrast, the keys in Binzel et al. are made from only a subscriber identification portion of an IMSI. *Binzel et al.*, paragraph [0017]. The keys in Binzel et al. thus do not include IMSI and MSISDN information but are at most generated from only a portion of an IMSI. Further, Binzel et al. compares keys between individual records and does not disclose a security function that associates the private content IMSI/MSISDN stored in the memory with the first MSISDN/IMSI combination. No such association of IMSI/MSISDN information is disclosed in Binzel et al. Hence, claim 1 is allowable.

Claim 1 is allowable for the additional reason that the cited portion of Binzel et al. fails to disclose a smart card having a first MSISDN/IMSI combination that includes MSISDN information, and a private content IMSI/MSISDN that includes MSISDN information. The Office Action admits on page 5 that Binzel et al. fails to disclose this feature and points to United States Patent Publication No. 2005/0176409 (Carpenter) to correct this deficiency. Carpenter discloses an arrangement in which Short Message Service (SMS) messages can be sent from multiple devices owned by a user in such a way that the recipient believes they are emanating from a single device of the user so that the sender can continually make use of only one of the devices to keep a single, consistent point of contact with others. *Carpenter*, paragraph [0005]. Carpenter discloses the use of a SIM that has a Mobile Station Integrated International Service Digital Network (MSISDN) parameter. *Carpenter*, paragraph [0024]. As such, Carpenter lacks a private content IMSI/MSISDN that includes IMSI and MSISDN information. Carpenter makes no mention of private content IMSI/MSISDN that includes MSISDN information.

Further, it would not have been obvious for one having ordinary skill in the art to modify Binzel et al. so that it includes at least one smart card having a first MSISDN/IMSI combination that includes IMSI and MSISDN information, a private content IMSI/MSISDN that includes IMSI and MSISDN information, and a security function that associates the private content IMSI/MSISDN stored in the memory with the first MSISDN/IMSI combination, as recited in claim 1. IMSI information provides a unique identity to a user or subscriber. MSISDN information of a SIM card relates to a telephone number of the SIM card in the cellular

telephone. Binzel et al. is directed towards a method in which multiple users may share an electronic device and access data on the electronic device if allowed. *Binzel et al.*, paragraph [0025]. As such, the method in Binzel et al. is directed towards allowing user access to information on the electronic device, and there is no reason or motivation to use MSISDN information of a SIM card because such MSISDN information relates to a telephone number of the SIM card and not to a user of the SIM card. No correlation between telephone numbers of SIM cards and information on electronic devices is mentioned in Binzel et al. Any such modification to Binzel et al. would detract from associating the user of a SIM card with information on the electronic device and, as such, would not have been obvious because it would change a principle of operation of the reference. Claim 1 is thus allowable for this additional reason.

Further, Binzel et al. and Carpenter fail to disclose or suggest a motivation to make the asserted combination. The Office Action states that "it would have been obvious to one of ordinary skill in the art at the time of the invention to provide the above teaching of Carpenter to Binzel in order to secure the private information that stores in the memory of mobile device." *Office Action*, page 6. Binzel et al. is directed towards generating key information to determine whether the record information on a removable memory device is associated with information stored on a mobile electronic device. *Abstract*, Binzel et al. Carpenter, in sharp contrast, is directed towards sending SMS messages that are masked in such a way that they appear to be coming from the same device, even if multiple devices are used, so that a user can maintain a single, consistent point of contact. *Carpenter*, paragraph [0005]. The two references are thus directed towards two completely different problems present in two completely different technical fields. Binzel et al. is concerned with data access technology, while Carpenter is directed towards sending text messages. Therefore, it would not have been obvious to one having ordinary skill in the art to combine these two references.

Claims 2-8 depend from claim 1, which Applicant has shown to be allowable. Hence, Binzel et al. fails to disclose at least one element of each of claims 2-8. Accordingly, claims 2-8 are also allowable, at least by virtue of their dependence from claim 1.

Further, the dependent claims recite additional features that are not disclosed by the cited references. For example, the cited portions of Binzel et al. fails to disclose a terminal wherein the private content comprises at least one group of contact information, and the private content IMSI/MSISDN is associated with each group, as recited in claim 7. Instead, Binzel et al. discloses a phonebook record on a SIM card that is combined with a voice tag on the NVM. *Binzel et al.*, paragraph [0023]. In another embodiment, the information stored on a cellular telephone is data such as voice tags, photos or links. *Binzel et al.*, paragraph [0025]. Nowhere does Binzel et al. disclose a terminal wherein the private content comprises at least one group of contact information and the private content IMSI/MSISDN is associated with each group. For this additional reason, claim 7 is allowable.

Claims 9-14 are Allowable

The Office has rejected claims 9-14 on page 2 of the Office Action, under 35 U.S.C. § 102(e) as being anticipated by Binzel et al. Applicant respectfully traverses the rejections.

The cited portion of Binzel et al. fails to disclose or suggest the specific combination of claim 9. For example, the cited portion of Binzel et al. does not disclose providing the private content with private content IMSI/MSISDN information that includes IMSI and MSISDN information unique to an owner of the private content, each SIM from a plurality of SIMs including respective IMSI/MSISDN information that includes IMSI and MSISDN information; and comparing the private content IMSI/MSISDN information with the IMSI/MSISDN information of a SIM to produce a comparison result, as recited in claim 9. Support for this claim amendment may be found in at least paragraphs [0018], [0020], and [0021] of Applicant's application.

Binzel et al. is directed towards an electronics device that includes a SIM card. *Binzel et al.*, paragraph [0013]. Insertion of the SIM card or powering up of the electronic device causes key information to be generated to determine whether any prior associations have been made between information on the SIM card and supplemental information stored on the electronic device. *Binzel et al.*, paragraph [0016]. The key information is generated from a subscriber identification portion of an International Mobile Subscriber Identity (IMSI). *Binzel et al.*, paragraph [0017]. A key is generated for each record on the SIM card. *Binzel et al.*, paragraph

[0017]. A corresponding key is stored on the electronic device for each record of supplemental information also stored thereon. *Binzel et al.*, paragraph [0018] and Fig. 3. If the key of the record on the SIM card matches the key associated with the record of the supplemental information, access is granted to the supplemental information by generation of a link between the two records. *Binzel et al.*, paragraph [0021] and Fig. 3.

In contrast to claim 9, Binzel et al. does not disclose providing the private content with private content IMSI/MSISDN information that includes IMSI and MSISDN information unique to an owner of the private content, each SIM from a plurality of SIMs including respective IMSI/MSISDN information that includes IMSI and MSISDN information, and comparing the private content IMSI/MSISDN information with the IMSI/MSISDN information of a SIM to produce a comparison result. In Binzel et al., a key for each record on the SIM card is compared to a key on each record of the supplemental information on the electronic device. *Binzel et al.*, paragraph [0021] and Fig. 3. The keys in Binzel et al. do not teach of MSISDN/IMSI information that includes IMSI and MSISDN information. In contrast, the keys in Binzel et al. are made from only a subscriber identification portion of an IMSI. *Binzel et al.*, paragraph [0017]. The keys in Binzel et al. thus do not include IMSI and MSISDN information but are at most generated from only a portion of an IMSI. Further, Binzel et al. compares keys between individual records and does not disclose comparing the private content IMSI/MSISDN information with the IMSI/MSISDN information of a SIM. No such comparison of IMSI/MSISDN information is disclosed in Binzel et al. Hence, claim 9 is allowable.

Claim 9 is allowable for the additional reason that Binzel et al. fails to disclose providing the private content with private content IMSI/MSISDN information that includes IMSI and MSISDN information unique to an owner of the private content, each SIM from a plurality of SIMs including respective IMSI/MSISDN information that includes IMSI and MSISDN information. The Office Action admits on page 5 that Binzel et al. fails to disclose MSISDN information and points to Carpenter to correct this deficiency. Carpenter discloses an arrangement in which Short Message Service (SMS) messages can be sent from multiple devices owned by a user in such a way that the recipient believes they are emanating from a single device of the user so that the sender can continually make use of only one of the devices to keep a single, consistent point of contact with others. *Carpenter*, paragraph [0005]. Carpenter discloses

the use of a SIM that has a Mobile Station Integrated International Service Digital Network (MSISDN) parameter. *Carpenter*, paragraph [0024]. As such, Carpenter does not provide private content with private content IMSI/MSISDN information that includes IMSI and MSISDN information unique to an owner of the private content. Carpenter makes no mention of providing the private content with private content IMSI/MSISDN information that includes IMSI and MSISDN information unique to an owner of the private content.

Further, it would not have been obvious for one having ordinary skill in the art to modify Binzel et al. so that it includes providing the private content with private content IMSI/MSISDN information that includes IMSI and MSISDN information unique to an owner of the private content, each SIM from a plurality of SIMs including respective IMSI/MSISDN information that includes IMSI and MSISDN information, and comparing the private content IMSI/MSISDN information with the IMSI/MSISDN information of a SIM to produce a comparison result, as recited in claim 9. IMSI information provides a unique identity to a user or subscriber. MSISDN information of a SIM card relates to a telephone number of the SIM card in the cellular telephone. Binzel et al. is directed towards a method in which multiple users may share an electronic device and access data on the electronic device if allowed. *Binzel et al.*, paragraph [0025]. As such, the method in Binzel et al. is directed towards allowing user access to information on the electronic device, and there is no reason or motivation to use MSISDN information of a SIM card because such MSISDN information relates to a telephone number of the SIM card and not to a user of the SIM card. No correlation between telephone numbers of SIM cards and information on electronic devices is mentioned in Binzel et al. Any such modification to Binzel et al. would detract from its stated purpose of associating the user of a SIM card with information on the electronic device and, as such, would not have been obvious because it would change a principle of operation of the reference. Correlation between the telephone number of a SIM card and information on the electronic device is not suggested in Binzel et al. and, as such, motivation to modify the reference is not present. Claim 9 is thus allowable for this additional reason.

Further, Binzel et al. and Carpenter fail to disclose or suggest a motivation to make the asserted combination. The Office Action states that "it would have been obvious to one of ordinary skill in the art at the time of the invention to provide the above teaching of Carpenter to

Binzel in order to secure the private information that stores in the memory of mobile device." *Office Action*, page 6. Binzel et al. is directed towards generating key information to determine whether the record information on a removable memory device is associated with information stored on a mobile electronic device. *Abstract*, Binzel et al. Carpenter, in sharp contrast, is directed towards sending SMS messages that are masked in such a way that they appear to be coming from the same device, even if multiple devices are used, so that a user can maintain a single, consistent point of contact. *Carpenter*, paragraph [0005]. The two references are thus directed towards two completely different problems present in two completely different technical fields. Binzel et al. is concerned with data access technology, while Carpenter is directed towards sending text messages. Therefore, it would not have been obvious to one having ordinary skill in the art to combine these two references.

Claims 10-14 depend from claim 9, which Applicant has shown to be allowable. Hence, Binzel et al. fails to disclose at least one element of each of claims 10-14. Accordingly, claims 10-14 are also allowable, at least by virtue of their dependence from claim 9.

Further, the dependent claims recite additional features that are not disclosed by the cited references. For example, the cited portions of Binzel et al. fails to disclose that the private content comprises at least one group of contact information and the private content IMSI/MSISDN is provided to each group, as recited in claim 11. Instead, Binzel et al. discloses a phonebook record on a SIM card that is combined with a voice tag on the NVM. *Binzel et al.*, paragraph [0023]. In another embodiment, the information stored on a cellular telephone is data such as voice tags, photos or links. *Binzel et al.*, paragraph [0025]. Nowhere does Binzel et al. disclose a method wherein the private content comprises at least one group of contact information, and the private content IMSI/MSISDN is provided to each group. For this additional reason, claim 11 is allowable.

Claims 15-20 are Allowable

The Office has rejected claims 15-20 on pages 4 and 6 of the Office Action, under 35 U.S.C. § 103(a) as being anticipated by Binzel et al. in view of Carpenter. Applicant respectfully traverses the rejections.

The cited portions of Binzel et al. and Carpenter do not disclose or suggest the specific combination of claim 15. For example, Binzel et al. and Carpenter do not disclose a system wherein the private content, or a pre-determined portion thereof, is associated with IMSI and MSISDN information; wherein the SIM identifies the subscriber by IMSI and MSISDN information stored on the SIM; and wherein access to all or to the pre-defined portion of the private content occurs only when the IMSI/MSISDN information of the SIM is checked against the IMSI/MSISDN information of the private content, or of the pre-defined portion of the private content, stored in the memory of the mobile equipment to yield a positive result, as recited in claim 15. Support for this claim amendment may be found in at least paragraphs [0018] and [0020] of Applicant's application.

In contrast to claim 15, the combination of Binzel et al. and Carpenter does not disclose a system wherein the private content, or a pre-determined portion thereof, is associated with IMSI and MSISDN information; wherein the SIM identifies the subscriber by IMSI and MSISDN information stored on the SIM; and wherein access to all or to the pre-defined portion of the private content occurs only when the IMSI/MSISDN information of the SIM is checked against the IMSI/MSISDN information of the private content, or of the pre-defined portion of the private content, stored in the memory of the mobile equipment to yield a positive result. In Binzel et al., a key for each record on the SIM card is compared to a key on each record of the supplemental information on the electronic device. *Binzel et al.*, paragraph [0021] and Fig. 3. The keys in Binzel et al. are not associated with IMSI and MSISDN information. In contrast, the keys in Binzel et al. are made from only a subscriber identification portion of an IMSI. *Binzel et al.*, paragraph [0017]. The keys in Binzel et al. thus do not include IMSI and MSISDN information. Further, Binzel et al. compares keys between individual records and does not disclose that access to all or to the pre-defined portion of the private content occurs when the IMSI/MSISDN information of the SIM is checked against the IMSI/MSISDN information of the private content, or of the pre-defined portion of the private content, stored in the memory of the mobile equipment to yield a positive result. No such check of IMSI/MSISDN information is disclosed in Binzel et al.

Carpenter was cited for disclosing a SIM card having an MSISDN. *Office Action*, page 5. Carpenter does not disclose private content or that access to all or to the pre-defined portion of

the private content occurs only when the IMSI/MSISDN information of the SIM is checked against the IMSI/MSISDN information of the private content, or of the pre-defined portion of the private content, stored in the memory of the mobile equipment to yield a positive result. As such, Carpenter fails to correct for the deficiencies noted in the primary reference of Binzel et al. Applicant respectfully submits that a *prima facie* case of obviousness does not exist based on the combination of Binzel et al. and Carpenter since all of the elements of claim 15 are not found in the combination of references.

Claim 15 is allowable for the additional reason that the combination of Binzel et al. and Carpenter fails to disclose a system wherein the private content, or a pre-determined portion thereof, is associated with IMSI and MSISDN information; wherein the SIM identifies the subscriber by IMSI and MSISDN information stored on the SIM. The Office Action admits on page 5 that Binzel et al. fails to disclose this feature and points to Carpenter to correct this deficiency. *Office Action*, page 5. As previously mentioned, Carpenter lacks private content, or a pre-determined portion thereof, that is associated with IMSI and MSISDN information. Carpenter makes no mention of private content, or a pre-determined portion thereof, that is associated with IMSI and MSISDN information.

Further, it would not have been obvious for one having ordinary skill in the art to modify the combination of Binzel et al. and Carpenter so that it includes a system wherein the private content, or a pre-determined portion thereof, is associated with IMSI and MSISDN information; wherein the SIM identifies the subscriber by IMSI and MSISDN information stored on the SIM; and wherein access to all or to the pre-defined portion of the private content occurs only when the IMSI/MSISDN information of the SIM is checked against the IMSI/MSISDN information of the private content, or of the pre-defined portion of the private content, stored in the memory of the mobile equipment to yield a positive result, as recited in claim 15. IMSI information provides a unique identity to a user or subscriber. MSISDN information of a SIM card relates to a telephone number of the SIM card in the cellular telephone. Binzel et al. is directed towards a method in which multiple users may share an electronic device and access data on the electronic device if allowed. *Binzel et al.*, paragraph [0025]. As such, the method in Binzel et al. is directed towards allowing user access to information on the electronic device, and there is no reason or motivation to use MSISDN information of a SIM card because such MSISDN

information relates to a telephone number of the SIM card and not to a user of the SIM card. No correlation between telephone numbers of SIM cards and information on electronic devices is mentioned in Binzel et al. Any such modification to the combination of Binzel et al. and Carpenter would detract from Binzel et al's. stated purpose of associating the user of a SIM card with information on the electronic device and, as such, would not have been obvious because it would change the principle of operation of the reference. Correlation between the telephone number of a SIM card and information on the electronic device is not suggested in Binzel et al. and Carpenter and, as such, motivation to modify the combined references is not present. Claim 15 is thus allowable for this additional reason.

Further, Binzel et al. and Carpenter fail to disclose or suggest a motivation to make the asserted combination. The Office Action states that "it would have been obvious to one of ordinary skill in the art at the time of the invention to provide the above teaching of Carpenter to Binzel in order to secure the private information that stores in the memory of mobile device." *Office Action*, page 6. Binzel et al. is directed towards generating key information to determine whether the record information on a removable memory device is associated with information stored on a mobile electronic device. *Abstract*, Binzel et al. Carpenter, in sharp contrast, is directed towards sending SMS messages that are masked in such a way that they appear to be coming from the same device, even if multiple devices are used, so that a user can maintain a single, consistent point of contact. *Carpenter*, paragraph [0005]. The two references are thus directed towards two completely different problems present in two completely different technical fields. Binzel et al. is concerned with data access technology, while Carpenter is directed towards sending text messages. Therefore, it would not have been obvious to one having ordinary skill in the art to combine these two references. For this additional reason, claim 15 is allowable.

Claims 16-20 depend from claim 15, which Applicant has shown to be allowable. Hence, Binzel et al. and Carpenter fail to disclose at least one element of each of claims 16-20. Accordingly, claims 16-20 are also allowable, at least by virtue of their dependence from claim 15.

Further, the dependent claims recite additional features that are not disclosed by the cited references. For example, the cited portions of Binzel et al. and Carpenter fail to disclose a system wherein the private content comprises at least one group of contact information, and an IMSI/MSISDN is associated with each group, as recited in claim 18. Instead, Binzel et al. discloses a phonebook record on a SIM card that is combined with a voice tag on the NVM. *Binzel et al.*, paragraph [0023]. In another embodiment, the information stored on a cellular telephone is data such as voice tags, photos or links. *Binzel et al.*, paragraph [0025]. Nowhere does Binzel et al. or Carpenter disclose a system wherein the private content comprises at least one group of contact information, and an IMSI/MSISDN associated with each group. For this additional reason, claim 18 is allowable.

Claim 19 is allowable for the additional reason that Binzel et al. and Carpenter do not disclose a system wherein the private content comprises one or more of the following groups of contact information: (a) push-to-talk, (b) instant text messaging, (c) instant voice messaging, (d) buddy list, (e) email addresses, or (f) phone numbers. Instead, Binzel et al. discloses a phonebook record on a SIM card that is combined with a voice tag on the NVM. *Binzel et al.*, paragraph [0023]. In another embodiment, the information stored on a cellular telephone is data such as voice tags, photos or links. *Binzel et al.*, paragraph [0025]. Also in Binzel et al., phone numbers are stored on the SIM card but are not stored on private content of the cell phone. *Binzel et al.*, paragraph [0026]. Nowhere does Binzel et al. or Carpenter disclose a system wherein the private content comprises one or more of the following groups of contact information: (a) push-to-talk, (b) instant text messaging, (c) instant voice messaging, (d) buddy list, (e) email addresses, or (f) phone numbers. For this additional reason, claim 19 is allowable.

CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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